

UNITED STATES OF AMERICA
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case:2:15-cr-20019
Judge: Leitman, Matthew F.
MJ: Majzoub, Mona K.
Filed: 01-15-2015 At 03:28 PM
INDI USA V. INGRAM ET AL (DA)

Violations:
18 U.S.C. § 1349 (conspiracy to
commit mail fraud)
18 U.S.C. § 1341 (mail fraud)
18 U.S.C. § 1349 (conspiracy to
commit wire fraud)
18 U.S.C. § 1343 (wire fraud)
18 U.S.C. § 371 (conspiracy)
26 U.S.C. § 7201 (Attempt to Evade or
Defeat Tax)

D-1 TORANIO INGRAM
D-2 INGRID THOMPSON
D-3 EDDIE MAURICE-MATTHEW JONES,

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. At all times relevant to this Indictment, the United States Department of

Housing and Development (HUD) was an agency of the United States Government.

2. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering and enforcing the tax laws of the United States. The Internal Revenue Code, and regulations enacted thereunder, provided the federal tax laws in the United States.

3. Every citizen and resident of the United States who received gross income in excess of the minimum filing amount established by law for a particular tax year is required to annually make and file an income tax return for that tax year, typically by April 15 of the following year. Individuals were required to prepare and file income tax returns on a Form 1040 or its equivalent.

4. At all times relevant to this Indictment, Computer Share was a third-party administrator responsible for the management and disbursement of publicly-traded companies' shareholder assets, which includes certificates and dividends.

5. Special T Tax Service, was a tax preparation business operated by TORANIO INGRAM and INGRID THOMPSON at 19803 W. McNichols, Detroit, Michigan

6. Twilight Check Cashing was formed by TORANIO INGRAM for the purpose of cashing fraudulently-obtained UFMIP refund checks, and unclaimed corporate dividend checks.

7. The Federal Housing Administration (FHA), a sub-agency of HUD provides

single-family insured mortgages.

8. The UFMIP is a lump sum ranging from 1 – 2.25% of loan value depending on the duration of the loan and loan to value ratio. The premiums are paid by the borrower either in cash at closing or financed via the loan.

9. The Federal Housing Administration (FHA), an agency of HUD, requires mortgage insurance on the mortgage loans it insures. The purpose of the insurance is to protect the lender. If the borrower defaults on his loan, the lender can file a claim against FHA's insurance fund and recover losses from the foreclosure process and loss of the loan. There are two calculations for FHA's mortgage insurance: an upfront insurance premium that is usually financed, and a monthly premium

10. Borrowers receive a refund when: they borrowed after September 1, 1983, they paid an up-front mortgage insurance premium, and did not default on mortgage payments.

11. Between 2008- 2009, the IRS offered a First Time Home Buyer Credit (FTHBC) tax credit of up to \$8,000 for first time home-buyers.

12. Utilizing a database for unclaimed property maintained by the State of California, TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES searched for unclaimed corporate dividends.

13. Once TORIANIO INGRAM and EDDIE MAURICE-MATTHEW JONES

located corporate dividends, they falsely represented themselves to be the individuals to whom the unclaimed dividends were owed.

14. To facilitate the conspiracy to commit wire fraud, TORANIO INGRAM, INGRID THOMPSON used stolen identifications to obtain FTHBC credits.

15. To facilitate the conspiracy to commit wire fraud, TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES, used stolen identifications during the submission of fraudulent UFMIP refunds.

COUNT ONE

(CONSPIRACY TO COMMIT MAIL FRAUD- 18 U.S.C. § 1349)

D-1 TORANIO INGRAM

D-3 EDDIE MAURICE-MATTHEWS JONES

16. The allegations in paragraph 1 through 15 of this Indictment are re-alleged and incorporated as if set forth fully herein.

17. Beginning on or about November 30, 2012, through on or about May 30, 2013, in the Eastern District of Michigan and elsewhere, TORANIO INGRAM and EDDIE MAURICE-MATTHEWS JONES and others known and unknown to the grand jury did willfully and knowingly combine, conspire, confederate and agree with each other and others, known and unknown to the Grand Jury to devise a scheme and artifice to defraud and to obtain monies and property from Computer Share and others by means of false and fraudulent pretenses, representations, and

promises, did for the purpose of executing said scheme and artifice knowingly transmit and cause to be transmitted by placing in an authorized depository for matter any matter or thing to be sent or delivered by the Postal Service a writing, sign, signal, and sound in violation of Title 18, United States Code, Section 1341.

PURPOSE OF THE CONSPIRACY

18. It was the purpose of the conspiracy for the defendants to defraud and obtain money by making false and fraudulent representations to Computer Share in order to obtain corporate dividend refunds due and owing to individual shareholders.

MANNER and MEANS

19. Defendants TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES submitted via U.S. Mail fourteen claims seeking unclaimed corporate dividends from Computer Share.

20. Using identifications to which they were not entitled to possess, defendants TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES submitted fraudulent claims to Computer Share in an attempt to obtain unclaimed corporate dividends to which they were not entitled.

21. Through the submission of false and fraudulent claims, the defendants caused a loss of approximately \$137,973.49.

COUNTS TWO-FIVE

(Mail Fraud- Title 18, United States Code Section 1344)

D-1 TORANIO INGRAM

D-3 EDDIE MAURICE-MATTHEW JONES

22. The allegations in paragraph 1 through 15 of this Indictment are re-alleged and incorporated as if set forth fully herein.

23. From on or about November 30, 2012, through on or about May 30, 2013, in the Eastern District of Michigan and elsewhere, the Defendants TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES, with the intent to defraud, willfully participated in, with knowledge of its fraudulent nature the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

24. On or about the dates described below, in the Eastern District of Michigan, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendants knowingly placed in an authorized depository for mail, to be sent and delivered by the Postal Service, the following matter: letters to Computer Share which fraudulently misrepresented the identification and addresses of individuals entitled to receive unclaimed corporate

dividends:

Victim	Date of Mailing to Computer Share	Date Disbursement Check Mailed by Computer Share	Amount of Check Cashed
P.M.C.	11/30/2012	12/6/2012	\$15,103.79
D.B.	12/12/2012	2/26/2013	\$30,539.88
D.G.	3/19/2013	4/1/2013	\$31,881.48
A.B.	12//12/2012	1/2/2013	\$13,330.37

All in violation of Section 1341 of Title 18 of the United States Code.

COUNT SIX

(18 U.S.C. § 1349-Conspiracy to Commit Wire Fraud)

D-1 TORANIO INGRAM

D-3 EDDIE MAURICE-MATTHEW JONES

25. The allegations contained in paragraphs contained in paragraphs 1-15 of this Indictment are re-alleged and incorporated as if set forth fully herein.

26. Beginning on or about August 30, 2010, through on or about February 12, 2012, in the Eastern District of Michigan and elsewhere, TORANIO INGRAM and EDDIE MAURICE-MATTHEWS JONES and others known and unknown to the grand jury did willfully and knowingly combine, conspire, confederate and agree with each other and others, known and unknown to the Jury to devise a scheme and artifice to defraud and to obtain money and property from the HUD by means of false and fraudulent pretenses, representations, and

promises, did for the purpose of executing said scheme and artifice knowingly transmit and caused to be transmitted by means of wire communication in commerce, writings, signals, and sounds, in violation of Title 18, United States Code, Section 1343 (wire fraud).

PURPOSE OF THE CONSPIRACY

27. It was the purpose of the conspiracy for the defendants to defraud and obtain money by making false and fraudulent representations to HUD in order to obtain refunds due and owing to individuals who purchased homes with the payment of Upfront Mortgage Insurance Premiums (UFMIP).

MANNER AND MEANS

Among the manner and means by which TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES carried out the conspiracy were the following:

28. Beginning in August 2010 and continuing through January 30, 2012, the defendants, TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES, submitted claims using fraudulently obtained personal identification for UFMIP insurance refunds.

29. The defendants utilized a website maintained by HUD to learn the names of the individuals to whom an UFMIP refund was owed.

30. Once the defendants, TORANIO INGRAM and EDDIE

MAURICE-MATTHEW JONES learned the names of the individuals to whom a UFMIP refund was owed, the defendants sent fraudulent claims via facsimile using wires traveling in interstate commerce to HUD contractors which administered UFMIP refunds.

31. On approximately 58 occasions, the defendant, EDDIE MAURICE-MATTHEW JONES caused fraudulently-obtained UFMIP refunds to be deposited into a checking account in name of Nationwide Fund Recovery which was owned and maintained by EDDIE MAURICE-MATTHEW JONES.

32. On approximately 48 separate occasions, the defendants, TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES caused fraudulently-obtained UFMIP refunds to be deposited into a checking account in name of Specialness Check Cashing, which was owned and maintained by TORANIO INGRAM.

COUNTS SEVEN-TEN

(18 U.S.C. § 1343-Wire Fraud)

D-1 TORANIO INGRAM

D-3 EDDIE MAURICE-MATTHEW JONES

33. The allegations in paragraph 1 through 15 of this Indictment are re-alleged and incorporated as if set forth fully herein.

34. From on or about August 30, 2010, through on or about January 30, 2012, in

the Eastern District of Michigan and elsewhere, the Defendants TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES, with the intent to defraud, willfully participated in, with knowledge of its fraudulent nature the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

35. On or about the dates described below, in the Eastern District of Michigan, for the purpose of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, the defendants, TORANIO INGRAM and EDDIE MAURICE-MATTHEW JONES did transmit and cause to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, and sounds, in violation of Title 18, United States Code, Section 1343 (wire fraud)

Defendant	HUD Customer	Date of Claim Submission to HUD Contractor	Date of UFMIP refund check mailed by HUD contractor	Check Amount
Ingram	M.S.S.	2/6/2012	2/13/2012	\$4500.65
Ingram	D.F.Y.	2/8/2012	2/17/2012	\$4,016.25
Jones	R.T.S.	12/13/2011	12/22/2011	\$2,621.72
Jones	P.A.V.	10/25/2011	11/11/2011	\$2,689.04

COUNT ELEVEN

(18 U.S.C. § 371-Conspiracy)

D-1 TORANIO INGRAM
D-2 INGRID THOMPSON

36. The allegations in paragraph 1 through 15 of this Indictment are re-alleged and incorporated as if set forth in full herein.

37. From on or about June 1, 2004, to in or about April 2011, in the Eastern District of Michigan, the Defendants herein, did unlawfully, voluntarily, intentionally, and knowingly conspire and agree with each other, to the Grand Jury, to defraud the United States and the IRS by impeding, impairing, obstructing, and defeating the lawful Government functions of the IRS in the ascertainment, assessment, computation and collection of the revenue, to wit income taxes.

38. Partnerships and corporations were required to report gross income on tax returns to be filed with the IRS. Partnerships are required to report gross income on IRS-Form 1065 to report each shareholder's share of income, deductions, and credits on a Schedule K-1.

39. It was a part of the conspiracy that the defendants would by deceit, craft, trickery and dishonest means, defraud the United States by failing to file partnership income tax between 2004 through 2010, in the Eastern District of Michigan, Southern Division.

MANNER AND MEANS

40. In order to further the conspiracy, the defendants TORANIO INGRAM and INGRID THOMPSON, and other individuals whose identities are known and unknown to the grand jury, used the following manner and means, among others, in the Eastern District of Michigan, and elsewhere:

41. Defendants, TORANIO INGRAM, and co-conspirator, INGRID THOMPSON prepared false and fraudulent First Time Home Buyer credits, in order to obtain a larger refund than what the client was entitled to receive if a truthful return were filed.

42. Defendant TOANIO INGRAM and INGRID THOMPSON submitted claims for First Time Home Buyer credits using social security numbers that they were not entitled to possess.

43. Approximately \$361,214 of the refunds from the false FTHBC claims were directed to defendant TORANIO INGRAM's personal checking account.

44. Approximately \$272,332 of the refunds from the false FTHBC claims were directed to bank account controlled by Specialty Properties which was controlled by defendants TORANIO INGRAM and INGRID THOMPSON.

OVERT ACTS IN FURTHERANCE OF CONSPIRACY

45. Between 2001-2010, defendants TORANIO INGRAM and INGRID THOMPSON operated a tax preparation business known as "Special T Tax

Service.”

46. Defendants TORANIO INGRAM and INGRID THOMPSON filed an application for partnership with the IRS and with the state of Michigan.

47. Defendant INGRID THOMPSON applied and received an Electronic Filer Identification Number (EFIN) which entitled her to file tax returns for individuals through the Specialty T partnership.

48. During the life of the partnership, the defendants TORANIO INGRAM and INGRID THOMPSON failed to file IRS-FORM 1065, a partnership tax return as obligated.

In violation of Title 18, United States Code, Section 371.

COUNT TWELVE

(26 U.S.C. § 7201 – *Attempt to Evade or Defeat Tax*)

D-1 TORANIO INGRAM

49. During the calendar year 2008, the defendant, TORANIO INGRAM, who was a resident of Detroit, Michigan, had and received taxable income of \$168,823.00. Upon that taxable income, there was owing to the United States of America an income tax of \$58,735.00. Well knowing and believing the foregoing facts, Toranio Ingram, on or about April 16, 2008, in the Eastern District of Michigan, did willfully attempt to evade and defeat the income tax due and owing by

him to the United States of America for the calendar year by failing to make an income tax return on or before April 16, 2008, as required by law, to any proper officer of the Internal Revenue Service the income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income.

In violation of Title 26, United States Code, Section 7201.

COUNT THIRTEEN

(26 U.S.C. § 7201 - Willful Failure to File Return)

D-1 TORANIO INGRAM

50. During the calendar year 2009, the defendant, TORANIO INGRAM, who was a resident of Detroit, Michigan, had and received taxable income of \$107,530.00. Upon that taxable income, there was owing to the United States of America an income tax of \$37,384.00. Well knowing and believing the foregoing facts, Toranio Ingram, on or about April 16, 2009, in the Eastern District of Michigan, did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by failing to make an income tax return on or before April 16, 2009, as required by law, to any proper officer of the Internal Revenue Service the income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his

true and correct income.

In violation of Title 26, United States Code, Section 7201.

COUNT FOURTEEN

(26 U.S.C. § 7201 - Willful Failure to File Return)

D-1 TORANIO INGRAM

51. During the calendar year 2010, the defendant, TORANIO INGRAM, who was a resident of Detroit, Michigan, had and received taxable income of \$54,848.00. Upon that taxable income, there was owing to the United States of America an income tax of \$19,248.00. Well knowing and believing the foregoing facts, Toranio Ingram, on or about April 16, 2010, in the Eastern District of Michigan, did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by failing to make an income tax return on or before April 16, 2010, as required by law, to any proper officer of the Internal Revenue Service the income tax, and by concealing and attempting to conceal from all proper officers of the United States of America his true and correct income.

In violation of Title 26, United States Code, Section 7201.

FORFEITURE ALLEGATION

(18 U.S.C. §§ 981(a)(1)(C), and 28 U.S.C. § 2461)

52. The allegations contained in Counts One through Eleven of this Indictment

are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

53. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1029(a)(1) and 1344 set forth in Counts One and Three through Five of this Indictment, the defendants TORANIO INGRAM, INGRID THOMPSON, and EDDIE MAURICE-MATTHEW JONES, shall forfeit to the United States of America: (A) pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of violations of Title 18, United States Code, Section 1029(a)(1); (B) pursuant to Title 18, United States Code, Section 1029(c)(1)(C), any personal property used or intended to be used to commit the violations of Title 18, United States Code, Section 1029(a)(1); and (C) pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of violations of Title 18, United States Code, Section 1344.

54. Further, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of a conspiracy to defraud the United States of and concerning its governmental functions and rights, in violation of Title 18, United States Code, Section 371, the defendants, TORANIO

INGRAM, INGRID THOMPSON, and EDDIE MAURICE-MATTHEW JONES shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.

55. If any of the property identified in connection with the foregoing, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and 1029(c)(2) and Title 28, United States Code, Section 2461(c).

All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2461(c).

THIS IS A TRUE BILL
s/Grand Jury Foreperson
Grand Jury Foreperson

DATE:

BARBARA L. MCQUADE
United States Attorney

s/Kevin M. Mulcahy
KEVIN M. MULCAHY
Assistant U.S. Attorney
Chief, General Crimes Unit

s/Philip A. Ross
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DATE: January 15, 2015

United States District Court
Eastern District of Michigan

Criminal Case Co

Case: 2:15-cr-20019
Judge: Leitman, Matthew F.
MJ: Majzoub, Mona K.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number: N/A
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: N/A
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>MR</i>

Case Title: USA v. TORANIO INGRAM, et. al.

County where offense occurred : Wayne

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 13-30327 & 14-30364]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below]

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

January 15, 2015
Date

Philip A. Ross
 PHILIP A. ROSS
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 Attorney Bar #: N/A

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.